

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
Plastech Engineered Products - Removal Polrep  
Final Removal Polrep

US EPA RECORDS CENTER REGION 5



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region V

**Subject:** POLREP #2  
Final  
Plastech Engineered Products  
C5L1  
Andover, OH  
Latitude: 41.6067211 Longitude: -80.5722960

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**From:** Elizabeth Nightingale and Tricia Edwards, OSC  
**Date:** 11/27/2013  
**Reporting Period:** 9/1/2013 - 10/29/2013

## 1. Introduction

### 1.1 Background

<b>Site Number:</b>	C5L1	<b>Contract Number:</b>	
<b>D.O. Number:</b>		<b>Action Memo Date:</b>	4/29/2013
<b>Response Authority:</b>	CERCLA	<b>Response Type:</b>	Time-Critical
<b>Response Lead:</b>	EPA	<b>Incident Category:</b>	Removal Action
<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	
<b>Mobilization Date:</b>	8/25/2013	<b>Start Date:</b>	8/26/2013
<b>Demob Date:</b>	10/29/2013	<b>Completion Date:</b>	10/29/2013
<b>CERCLIS ID:</b>	OHN000510895	<b>RCRIS ID:</b>	
<b>ERNS No.:</b>		<b>State Notification:</b>	
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

#### 1.1.1 Incident Category

Time Critical Removal Action

#### 1.1.2 Site Description

The site is an abandoned industrial property in a mixed residential/rural area in Andover, Ohio, and has a documented history of vandalism. The property is approximately 20 acres in size and contains a former manufacturing building of approximately 274,000 square feet and a southern parking lot. The site is bordered by a wooded area to the north and east, a creek and residential properties to the south, industrial and residential properties to the west. According to records from Ohio EPA, approximately 51 people reside within the site and 228 people reside within 1 mile of the site. An elementary school and a public library are within 0.5 miles of the site. Pymatuning Valley Middle and High Schools are located 0.65 mile west of the site. The site is fenced, however not all gates are locked, allowing access by the public, potentially including neighborhood school children and trespassers. During the site assessment, EPA observed that several doors and glass windows to the building had been damaged by vandalism. Other signs of vandalism were observed around the building, including graffiti, electrical transformer oil leaks onto the ground surface, and damaged electrical wiring in the building from unauthorized metal scrapping activities.

An unnamed creek along the southern site boundary flows east toward Pymatuning Reservoir located downstream of the site. Pymatuning Reservoir is a man-made lake approximately 26.7 square miles in size on the border between Ohio and Pennsylvania. Pymatuning Reservoir is part of the Shenango River watershed and is surrounded by Pymatuning State Parks in Ohio and Pennsylvania. Pymatuning Reservoir also serves as a public water supply for residents in Ohio and Pennsylvania.

According to Ohio EPA, the site is located within a Source Water Protection Area for the Village of Andover. According to Ohio EPA, the public groundwater supply in Andover, Ohio, is highly susceptible to contamination because the source aquifer has a shallow depth to water of 12 to 25 feet below ground surface; the aquifer is well-confined from surface infiltration; and potential contaminant sources are located in the Source Water Protection Area. The Village public water system supplies approximately 1,150 residents. The public water supply is

draws from seven groundwater wells pumping approximately 186,000 gallons per day.

#### **1.1.2.1 Location**

The site is located at 205 Maple Street Extension, Andover, Ashtabula County, Ohio, 44003. The location coordinates are latitude 41.61278° and longitude - 80.56873°. The site is bounded by a wooded area to the west, a creek and residential properties to the south, and industrial and residential properties to the east.

#### **1.1.2.2 Description of Threat**

Uncontrolled hazardous substances including reactive oxidizers, toxic substances and highly caustic substances were documented on site during the site assessment. Many waste containers are in poor condition and there are signs of leakage or spillage on nearby floor surfaces inside the building. Oil-stained surface soil and debris was observed surrounding three electrical transformers outside the building. During the site assessment, unauthorized access to the site property and building were observed.

Uncontrolled hazardous substances at the site could be released to soil and groundwater, the atmosphere, and nearby surface waterways. Potential exposure through each of these migration pathways could cause harm or endangerment to human health, welfare, or the environment. These chemicals could be ingested by people, pets; tracked off-site by visitors and trespassers; and spread throughout the area, into residential homes and businesses. Release of these chemicals could impact the shallow groundwater aquifer used by the community as a source of drinking water. There is a potential for direct contact with the hazardous substances because the site is bordered by a residential neighborhood and within half a mile of an elementary school and public library. Overall, the potential for exposure to hazardous substances stored at the site is high, especially considering the on-site building is no longer occupied and vandals have accessed the interior of the facility.

#### **1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results**

Characteristically corrosive, toxic and reactive wastes were documented on site, as well as high atmospheric concentrations of VOCs in former painting areas. Seven total samples were collected from among the 23 drums, 40 containers, four transformers, and sumps and trenches that were observed on site. The content of many of the remaining containers is unknown, as most were unlabeled.

## **2. Current Activities**

### **2.1 Operations Section**

#### **2.1.1 Narrative**

During previous inspections and assessments, known or suspected hazardous substances, pollutants and other contaminants were identified in 8 areas:

**Area 1** – former paint mixing area (3,860 square feet in area) in the northwest corner of the former

manufacturing building with in-floor sumps and trenches;

- Area 2** – small (1,670 square feet) open courtyard between structural additions of the former manufacturing building; includes a small storage outbuilding and a caged electrical transformer on a concrete pad;
- Area 3** – large (40,000 square feet) raw material warehouse and storage area at the northeast corner of the former manufacturing building;
- Area 4** – small (780 square feet) outbuilding near the southern property line filled with parts and containers;
- Area 5** – outdoor transformer cage and concrete pad (1,450 square feet) at the southeastern corner of the former manufacturing building;
- Area 6** – large (19,000 square feet) centrally-located room that formerly housed hydraulic plastic injection molding equipment; includes in-floor sumps and trenches for hydraulic oil;
- Area 7** – small (1,350 square feet) storage room in the north side of the former manufacturing building containing drums; and
- Area 8** – former paint line loading area and finishing room (14,800 square feet) in the western side of the former manufacturing building.

EPA inspectors documented a total of 23 drums containing an estimated total of 437 gallons of abatement material at the site. All drums were located inside the manufacturing and outbuildings. Samples were collected from all drums. Two of the drums contained liquid, and one contained a solid material. All three drums were analyzed for flashpoint, corrosivity (pH), toxicity characteristic leaching procedure (TCLP) metals, TCLP volatile organic carbons (VOCs), and TCLP semi-volatile organic carbons (SVOCs). The waste in the first drum had a pH of 1.2, which exhibits the characteristic of corrosivity within the definition of 40 C.F.R. § 261.22(a)(1). Lead was detected at 8.9 milligrams per liter (mg/L) in the second drum, which exceeds the toxicity characteristic for lead of 5.0 mg/L. All other results for samples taken from the drums were below the respective reporting limits or applicable regulatory limits.

In addition to the 23 drums, 40 small containers were documented at the site. A liquid sample was collected from one small container, and analyzed for the same parameters as the drum samples. All results for this sample were below the respective reporting limits or applicable regulatory limits. A solid sample was collected from a small container that was labeled as an oxidizer. This sample was identified using a Smiths Detection 360 and an Ahura FirstDefender as 1,3-dichloro-5,5-dimethylhydantoin, with a trade name of Dakin. This material is a water-reactive, combustible solid that easily oxidizes, is reactive with xylene, and can produce toxic fumes on reaction to water. According to 40 C.F.R. § 261.22(a), waste is characteristically reactive when it has a pH less than 2 or greater than 12, reacts violently or dangerously with water, or generates dangerous toxic fumes when mixed with water.

Area 1 contains three in-floor sumps and trenches containing suspected paint sludge. During the site visit, strong organic vapor odors and field screening readings near 400 ppm total VOCs were recorded. Disposal was not observed in the sumps and trenches, and it is unknown whether these drains are a closed network. Spray booth filters were also observed inside a partially-dismantled former abatement system outside the building. A liquid sample was collected from a sump in Area 1, and analyzed for flashpoint, pH, TCLP metals, TCLP VOCs, TCLP SVOCs, and polychlorinated biphenyls (PCBs). All results for this sample were below the respective reporting limits or applicable regulatory limits. Sumps and trenches

were not sampled.

Four large electrical transformers in Areas 2 and 5 containing an estimated maximum total of 1,200 were observed at the site. In Area 5, surface soil, vegetation and the concrete pad around the transformer were coated with liquid oil. Samples of the oil within a transformer in Area 5 and the soil below it were collected and analyzed for PCBs. Aroclor 1260 was detected at 3.9 mg/kg in the liquid oil sample. This level is below the Substances Control Act regulatory limit of 50 ppm for electrical transformers. Aroclor 1260 was detected in a soil sample at a concentration of 0.43 mg/kg. This result is below the State of Ohio Generic Direct CERCLA regulatory limit of 18 mg/kg for soil on industrial and commercial properties. Transformers in Area 1 were not sampled.

This removal action will involve properly identifying, consolidating, and packaging hazardous materials. The consolidated materials will be removed and ultimately disposed of off-site. Additional site activities include security, perimeter air monitoring, and decontamination on the site, as needed to complete the removal action. This response action will be conducted in accordance with Section 104(a)(1) of CERCLA, 42 U.S.C. 9604(a)(1) and Section 300.415 of the NCP, 40 C.F.R. § 300.415, to abate or eliminate the immediate threat to public health and/or the environment by the presence of the hazardous substances. No uncontrolled hazardous substances are expected to remain at the site once the removal action is completed.

## **2.1.2 Response Actions to Date**

### **Overall Summary:**

- Area 1** – Area has been fully addressed. Cleaning and removal of waste from trenches and sumps in this area was fully completed.
- Area 2** – Area has been fully addressed. Sample of waste oil collected from transformer. The contents of the transformer were put into two drums, each containing approximately 300-gallons of waste oil, on 9/4/13.
- Area 3** – Area has been fully addressed. All containers were removed, characterized and staged for disposal.
- Area 4** – Area has been fully addressed. All containers with any remaining content were removed, characterized and staged for disposal. Containers were cut up for disposal on 9/4/13.
- Area 5** – Area has been fully addressed. Transformer carcasses were not found to contain oil at the time of removal start. Approximately 100 gallons of waste oil from within transformer switchgear was removed for disposal. Oily debris and vegetation at the base of transformer were removed on 9/3/13.
- Area 6** – Area has been fully addressed. Waste material was removed from 3 in-floor sumps and trenches and staged for disposal.
- Area 7** – Area has been fully addressed. All containers were removed, characterized and staged for disposal.
- Area 8** – Area has been fully addressed. All containers were removed, characterized and staged for disposal.

### **Air Monitoring:**

Air monitoring will be conducted daily throughout the site building and around areas where the crew is working. MultiRAE Plus 5-gas monitor and PDR particulate monitor. Action levels have been established. No exceedance action levels occurred.

### **Daily Activity Summary:**

*September 3, 2013*

The crew re-mobilized to the site after the holiday weekend. Oily debris and vegetation was scraped up around the three transformers in Area 5 and containerized for disposal. The crew swept up broken fluorescent light bulbs from the concrete pad outside Area 1 and from several places inside the building.

*September 4, 2013*

The crew used hand tools to cut up 33 empty drums for disposal. Approximately 900 gallons of waste oil was removed from the transformer in Area 5 using a pneumatic diaphragm pump and air compressor. The waste oil was contained in 300-gallon totes for disposal. The crew over-packed 5 small containers and placed them in the connex box. Additional broken pieces of fluorescent light bulbs were swept up from floors inside the building and containerized for disposal.

Air monitoring was conducted throughout the site building. Air monitoring results throughout the building did not exceed background levels.

Two ERRS crew members and one START member demobilized from the site.

*September 5, 2013*

The remaining crew members demobilized from the site. Containerized wastes were temporarily stored inside the connex box pending receipt of waste profile analytical results and coordination with transport and disposal contractor.

*October 28, 2013*

The crew re-mobilized to the site with a skid steer. The crew conducted a walkthrough of the site and checked that containerized wastes temporarily staged inside the connex box were secure.

*October 29, 2013*

The crew used the skid steer to load containerized wastes onto a truck to be transported to the designated disposal site, Petro-Chem Processing Group in Detroit, Michigan. Copies of the disposal manifest were retained for the site. Site personnel demobilized from the site.

### **2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)**

Efforts are ongoing to further develop information and continue to pursue enforcement activities.

### **2.1.4 Progress Metrics**

<i><b>Waste Stream</b></i>	<i><b>Medium</b></i>	<i><b>Quantity</b></i>	<i><b>Manifest #</b></i>	<i><b>Treatment</b></i>	<i><b>Disposal</b></i>
D001 Flammables	Solids Containing Flammable Liquids	800 Pounds	011328840 JJK		Petro-Chem Processing 421 Lys Detroit, 48214 (313) 82
D002 Corrosives	Liquid	195	011328840		Petro-Chem

		Gallons	JJK		Process 421 Lyc Detroit, 48214 (313) 82
D009 Mercury	Solids	700 Pounds	011328840 JJK		Petro-CI Process 421 Lyc Detroit, 48214 (313) 82
Universal Waste florescent bulbs	Solids	5 Pounds	011328840 JJK		Petro-CI Process 421 Lyc Detroit, 48214 (313) 82
Oxidizer Waste	Solids	15 Pounds	011328840 JJK		Petro-CI Process 421 Lyc Detroit, 48214 (313) 82
Phenol Waste	Solids	10 Pounds	011328840 JJK		Petro-CI Process 421 Lyc Detroit, 48214 (313) 82
Waste Oil and Liquids	Liquids	1315 Gallons	011328840 JJK		Petro-CI Process 421 Lyc Detroit, 48214 (313) 82

#### R5 Priorities Summary

This is an Integrated River Assessment.  
The numbers should overlap.

Miles of river systems cleaned  
and/or restored n/a

Cubic yards of contaminated  
sediments removed and/or  
capped n/a

	Gallons of oil/water recovered	1315 gallons
	Acres of soil/sediment cleaned up in floodplains and riverbanks	n/a
Stand Alone Assessment	Acres Protected	20
	Number of contaminated residential yards cleaned up	0
	Human Health Exposures Avoided	57
	Number of workers on site	8

Contaminant(s) of Concern

Leachable lead, 1,3 dichloro-5,5 dimethylhydantoin, flammables, corrosives, mercury, waste oils, oxidizers, phenol.

## 2.2 Planning Section

### 2.2.1 Anticipated Activities

None

#### 2.2.1.1 Planned Response Activities

#### 2.2.1.2 Next Steps

None

### 2.2.2 Issues

None

## 2.3 Logistics Section

ERRS managed site logistics.

## 2.4 Finance Section

### 2.4.1 Narrative

ERRS costs are estimated through October 25, 2013. START costs are estimated through November 8, 2013

### Estimated Costs \*

	Budgeted	Total To Date	Remaining	% Remaining
<b>Extramural Costs</b>				
ERRS - Cleanup Contractor	\$60,000.00	\$46,441.00	\$13,559.00	22.60%
TAT/START	\$25,000.00	\$11,658.00	\$13,342.00	53.37%
<b>Intramural Costs</b>				
<b>Total Site Costs</b>	<b>\$85,000.00</b>	<b>\$58,099.00</b>	<b>\$26,901.00</b>	<b>31.65%</b>

\* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Cost data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

## 2.5 Other Command Staff

### 2.5.1 Safety Officer

The OSCs served in this role for the site.

### 2.5.2 Liaison Officer

The OSCs served in this role for the site.

### 2.5.3 Information Officer

The OSCs served in this role for the site.

## 3. Participating Entities

### 3.1 Unified Command

n/a

### 3.2 Cooperating Agencies

Ohio EPA

Andover Police Department

Andover Fire Department

## 4. Personnel On Site

Personnel on site on 9/4/13:

EPA: 1

START: 1

ERRS: 5

Andover Police Department: 2

Personnel on site on 9/5/13:

EPA: 1  
ERRS: 2

Personnel on site on 9/6/13:

EPA: 1  
ERRS: 2

Personnel on site on 10/28/13:

ERRS: 2

Personnel on site on 10/29/13:

EPA: 1  
START: 1  
ERRS: 3

## **5. Definition of Terms**

ATSDR	Agency for Toxic Substances and Disease Registry
BZ	Breathing Zone
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CERCLIS	Comprehensive Environmental Response, Compensation, and Liability Information System
DNR	Department of Natural Resources
EPA	Environmental Protection Agency
ERNS	Emergency Response Notification System
ERRS	Emergency and Rapid Response Service
NG/M <sup>3</sup>	nanograms per cubic meter
NCP	National Oil and Hazardous Substance Pollution Contingency Plan
NOAA	National Oceanic and Atmospheric Administration
NPL	National Priorities List
NRC	National Response Center
OSC	On Scene Coordinator
PPE	Personal Protective Equipment
PPM	Parts per million
RCRIS	Resource Conservation and Recovery Act Information System
RP	Responsible Party
RRT	Regional Response Team
START	Superfund Technical Assessment and Response Team
US FWS	United States Fish and Wildlife Service
USCG	United States Coast Guard

## **6. Additional sources of information**

**6.1 Internet location of additional information/report**  
[www.epaosc.org/plastech](http://www.epaosc.org/plastech)

**6.2 Reporting Schedule**

No further POLREPs will be issued as the action has been completed.

**7. Situational Reference Materials**

n/a